IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

MICHAEL DAVID SILLS and MARY)	
SILLS,	
Plaintiffs,)	
,)	Case No.: 3:23-cv-00478
v.)	
)	Judge William L. Campbell, Jr.
SOUTHERN BAPTIST CONVENTION, et)	Magistrate Judge Jeffery S. Frensley
al.,	
)	JURY TRIAL DEMANDED
Defendants.	

PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to L.R. 5.03 and the Agreed Protective Order (Dkt. No. 149), Plaintiffs respectfully submit this Motion for Leave to File Under Seal their Opposition to Motion for Summary Judgment ("Opposition") and supporting documents and exhibits.

Plaintiffs' Opposition and Plaintiffs' Response to Defendants' Statement of Undisputed Material Facts and Statement of Additional Facts in Opposition to the Executive Committee of the Southern Baptist Convention and Rolland Slade's Motion for Summary Judgment with Respect to Plaintiff Mary Sills ("Response to Statement of Facts") contain discussions of and references to material which has been designated by the producing Parties as Confidential or Highly Confidential under the Agreed Protective Order. These materials are discussed and/or cited in the Response to Statement of Facts and in the Opposition as exhibits 1-15, 17-26, and 29-40. Plaintiffs will file a redacted Opposition and Response to Statement of Facts on the docket, but placing the entirety of the Opposition, Response to Statement of Facts, and exhibits containing a confidentiality designation on the docket would be improper under the agreement to maintain confidentiality. Plaintiffs will provide Defendants with all materials filed under seal after filing.

Dated: July 11, 2025 Respectfully submitted,

By: /s/ *Katherine B. Riley*

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Katherine B. Riley, hereby certify that on July 11, 2025, I served the above and foregoing on all counsel of record via the Court's CM/ECF filing system.

/s/ Katherine B. Riley
Katherine B. Riley